



December 20, 2024

*Via ECF*

The Honorable Vernon S. Broderick  
 The U.S. District Court for the Southern District of New York  
 Thurgood Marshall United States Courthouse  
 40 Foley Square, Room 415  
 New York, NY 10007

Re: *Jones Lang LaSalle Brokerage, Inc. v. Nityo Infotech Corporation, 1:23-cv-10738-VSB*

Dear Judge Broderick:

Counsel for Plaintiff / Counterclaim Defendant Jones Lang LaSalle Brokerage, Inc. (“JLL”) and counsel for Defendant / Counterclaim Plaintiff Nityo Infotech Corporation (“Nityo”) respectfully submit this joint letter pursuant to the Court’s order of November 12, 2024, ECF No. 28.

1. **Dispositive Motions.** JLL intends to move for summary judgment with respect to its claims as well as Nityo’s counterclaims against JLL. Nityo does not intend to move for summary judgment. The parties will be prepared to discuss a briefing schedule for JLL’s motion during the post-discovery teleconference scheduled for January 6, 2025 at 2:00 p.m.
2. **Settlement Efforts.** Since the parties’ joint letter submitted to this Court on March 7, 2024, ECF No. 14, the parties have engaged in further settlement discussions via counsel, which discussions were not fruitful. At the present time, the prospect of settlement remains low.
3. **Discovery Disputes.** Based on testimony provided by Nityo personnel during their depositions, by letter dated October 17, 2024, JLL requested that Nityo produce documents regarding specific topics that were responsive to JLL’s requests for production but had been omitted from Nityo’s production. On November 6, 2024, Nityo responded with a supplemental production of five documents. As set forth in a letter to Nityo dated November 11, 2024, JLL views Nityo’s supplemental production as inadequate and incomplete. However, based on Nityo’s representation that it is unable to produce additional documents concerning the identified topics, JLL has elected not to pursue this discovery dispute further. JLL nonetheless reserves the right to seek to exclude testimony concerning the topics with respect to which Nityo’s production is insufficient.

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP

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4. **Referral to Magistrate Judge.** The parties do not request referral to a Magistrate Judge for settlement purposes.

Respectfully submitted,

  
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